



31 March 2013

Ms. Cora Stanley  
Region 6, USEPA 6MD-RT  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202

RE: Potential Conflict of Interest Notification  
Exxon-Mobil Pipeline Co.  
Crude Oil Discharge from Pipeline  
50 Starlight, Mayflower, Faulkner County, Arkansas  
TDD: TBD  
EPA Contract: EP-W-06-042

Submitted via email on 31 March 2013

Dear Ms. Stanley:

This letter documents a potential conflict of interest notification associated with the above-referenced project. Weston was tasked on Friday evening, 29 March, to respond to a crude oil discharge from a pipeline. An unknown amount of crude oil was discharged. The PRP was identified as Exxon-Mobil Pipeline Co. The tasking OSC is Chris Ruhl. Weston has previously worked for Exxon-Mobil Pipeline Co., and other Exxon-Mobil affiliated companies.

**POTENTIAL CONFLICT OF INTEREST NOTICE**  
**EXXON MOBIL PIPELINE, CO.**

**1. Name and location of site/facility:**

START has been tasked to respond to a crude oil discharge from a pipeline. An unknown amount of crude oil was discharged. The PRP was identified as Exxon-Mobil Pipeline Co.

PRP: Exxon-Mobil Pipeline Co.  
Location: 50 Starlight, Mayflower, Faulker County, Arkansas  
Description: Emergency Response  
EPA OSC: Chris Ruhl  
START FTL: Hilary Gafford

**2. TDD NO: TBD**

**3. Has Weston or any employee that will be working at this site previously performed work at this site/facility? No**

4. If yes, has Weston or any employee that will be working at this site previously performed work at this site/facility during the past 3 calendar years? N/A  
If yes, then:
- A. Type of work Weston has performed for the client:
  - B. Names of employees who worked at site:
  - C. Dates work took place:
  - D. Clients for whom work was performed:
5. Are the clients involved at this site current (within past 3 years) Weston clients:  
Yes. Weston has performed approximately \$100,000 of work for Exxon-Mobil Pipeline Company over the last three years.
6. Is this a site assessment or a removal site: No
7. Names of known, potentially responsible parties (PRPs): Exxon-Mobil Pipeline Co.
8. If a PRP/client is a current Weston client:
- A. Does the contract dollar or revenue dollar value of work performed for the client within the past 3 years exceed \$250,000? No
  - B. Total contract dollars within last 3 years: Approximately \$100,000

**FEDERAL SITES/FACILITIES: (DOD, DOI, etc.)**

9. What federal agency is/was involved at site ? N/A
10. Has Weston performed work for this federal agency involving the same site and/or same people? Is there impending work for this federal agency involving the same site and/or same people? N/A

**REGARDING ALL SITES:**

11. If the site is high visibility – including public, media, and/or political interest -- please report any work that Weston has performed for the client (federal or private) currently or in the past. (See above.): N/A
12. Provide any additional information which may be pertinent to this situation. (Including, but not limited to, whether work is completed, or whether the work/contract is finally settled and paid; if the work was performed more than 3 years ago; and when work was performed; etc.) Weston has conducted 22 projects (\$340,000) for Exxon-Mobil Pipeline Co over the last 11 years, and over 130 projects (\$4.5M) for Exxon-Mobil affiliated companies over the last 25 years.

START currently has four personnel providing on-site support including air monitoring, oil recovery monitoring, and monitoring and evaluation of downstream conditions. It is uncertain at this time how long on-site support will be necessary. At this time, START will continue to perform activities as tasked within the TDD and directed by the OSC unless we hear differently from you.

Very truly yours,

WESTON SOLUTIONS, INC.

*Robert B. Beck*

Robert B. Beck, P.E.  
Program Manager

cc: Ms. Linda Carter (EPA)  
Mr. Will Labombard  
Mr. David Crow (Weston)  
Ms. Cecilia Shappee (Weston)